IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH

IN THE MATTER OF THE SEARCH OF A 2015 CHEVROLET SILVERADO 1500 TRUCK, VIN 3GCUKPEC9FG443808, UTAH STATE LICENSE PLATE "T337DY," REGISTERED TO COLIN WALKER ANDERTON

Case No. 2:25mj92 CMR

AFFIVADIT IN SUPPORT OF AN APPLICATION FOR A SEARCH WARRANT

I, William Stone, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

- 1. I make this affidavit in support of an application for a search warrant involving a brown, 2015 Chevrolet Silverado 1500 pickup truck (VEHICLE), further described in Attachment A, for the things described in Attachment B.
- 2. I am employed by the NPS within the Department of the Interior as a United States Park Ranger. I have been employed in this position full-time since 2021. Prior to that, I was employed in the same position on a seasonal basis for the NPS. I completed the Seasonal Law Enforcement Training Program (SLETP), a Federal Law Enforcement Training Center (FLETC) accredited program, at the Rangely Community College in 2018 and earned the NPS SLETP Director's Award. I completed the Land Management Police Training Program (LMPT) at FLETC in 2022 and earned the LMPT Academic Award and the FLETC Director's Leadership Award. That same year, I completed the Field Training Evaluation Program administered by FLETC and the NPS. I have worked in a federal law enforcement capacity in Massachusetts, Virginia, and Utah. Annually, I complete a minimum forty hours of law enforcement-related training including, but not limited to, authority and jurisdiction, control tactics, firearms, use of force, and Archeological

Resource Protection Act (ARPA), and victim advocacy. I have authored federal search warrants for cases dealing with the trespass, theft, and damage to historical sites.

Page 2 of 18

- 3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement officers. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.
- 4. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of the following have been committed by ANDERTON: 18 U.S.C. §§ 641 (Theft of Government Property); and 1361 (Depredation of Government Property). Additionally, I believe ANDERTON has committed numerous misdemeanor violations of 36 C.F.R., which are punishable under 18 U.S.C. § 1865, to wit: 36 C.F.R. §§ 2.30(a)(1) (Unlawful Possession of the Property of Another); 2.30(a)(5) (Acquiring Stolen Property); 2.31(a)(2) (Tampering with Property); and 2.31(a)(3) (Destroying/Damaging Property).

PROBABLE CAUSE

5. On September 7, 2024, a non-commissioned Bureau of Land Management (BLM) employee was collecting fees from various canisters on BLM lands. He encountered a suspicious individual later identified by photograph line-up as ANDERTON. The BLM employee reported that ANDERTON was driving a VEHICLE, described as a "mid-2000s model of Chevy or possibly a Tundra." After ANDERTON left, the employee noticed a coat hanger sticking out of the fee canister's slot. This information and that within the paragraph below was relayed by BLM Law Enforcement Ranger C. Marsh during a conversation in January 2025.

- 6. On September 12, 2024, ANDERTON was arrested by the Grand County Sheriff's Office for theft of value less than \$500 and for criminal trespass. Particularly, ANDERTON was arrested for stealing from a private fee canister in Pritchett Canyon, outside of Moab, Utah.
- 7. On November 7, 2024, I discovered an NPS trail camera and portable solar panel were stolen from the Cave Spring Trail parking lot in the Needles District of the park. The trail camera was secured within a metal security box. Both the trail camera, solar panel, and attached locks were missing. However, the vegetation to which these items were attached were not damaged or disturbed; rather, it looked as though someone had the capability to cut or remove the locks directly.
- 8. Soon after, I also saw the canisters had their respective locks or interior collection box removed and were barren of any significant amount of money. At multiple trailheads within the park were donation canisters—metal bollards with education brochures and a slot in which visitors could donate money. Three of the four canisters were unlocked by a padlock and opening a hinged door in the rear of the canister; the third canister was opened by a key inserted into an internal lock from which the interior collection box could be removed. The donated money belonged to the Canyonlands Natural History Association (CNHA)—an NPS friends' group and concessionaire—as they provided the brochures. I noticed that the canister with the interior collection box had new scratch marks or scoring around the lip where the box fit into the bollard (see Figure 1 and 2).



Figure 1. Midview of the donation canister at the Slickrock Trailhead, Needles District, CANY.

The interior collection canister is missing.



Figure 2. Close-up of the donation canister at the Slickrock Trailhead, Needles District, CANY. The interior collection canister is missing. Score marks at the top of the lip are visible.

- 9. A non-commissioned NPS employee responsible for the collection of the donations informed me that they were last collected in the spring. Based on my experience with the amount of money collected in these canisters, there should have been approximately \$50 in currency within each. Additional padlocks were secured on the remaining canisters.
- 10. The last time I had seen the canisters and trail camera intact was on October 24, 2024. I concluded the theft had occurred between that date and November 7, 2024. Thus, I reviewed the park entrance booth's security camera footage during that time. The following paragraph is based on my observations of that footage.
- 11. On October 31, 2024, at approximately 0307 hours, the VEHICLE drove past the entrance booth, entering the park through the exit lane (Figure 3). Approximately two hours later at 0507 hours, the same VEHICLE drove past the entrance booth, exiting the park through the entrance lane (Figure 4). I identified the following details about the VEHICLE:
 - a. 2014-2018 Chevrolet Silverado 1500 or 2500 Crew Cab;
 - b. Dark in color (i.e., not white or silver);
 - c. Spoke-like rims;
 - d. Round side-mirrors;
 - e. Square wheel-wells; and
 - f. Step-notches in the rear bumper.



Figure 3. The VEHICLE enters the park on October 31, 2024.



Figure 4. The same suspicious VEHICLE exits the park on October 31, 2024.

- 12. Based on my experience and training, the behavior of entering and exiting the park in the early hours of the morning by using the wrong lanes of traffic is abnormal for the park. Moreover, the amount of time the VEHICLE spent within the park was enough to reach each of the donation canisters, break them open, and leave.
- 13. On January 4, 2025, I found the Cave Spring Trail canister's lock was again removed and missing. An inspection of the Pothole Point canister shows its lock missing and

new scratch or score marks where the padlock closed the latch (Figure 5). I secured this and the Cave Spring Trail canister with zip ties as no additional padlocks remained.



Figure 6. Pothole Point donation canister's collection door. Fresh score marks appear on the latch and around the door. Zip tie added after initial discovery.

14. I exited the park and drove about two miles down SR-211 to the BLM's Hamburger Rock campground. There, I discovered that the interior fee canister had been removed (Figure 6). I photographed the site and inspected the other two nearby BLM campgrounds—Creek Pasture and Superbowl; both remaining canisters were intact. I emailed BLM Law Enforcement Rangers M. Olsen and G. Clarke and provided my report and photographs. From further conversations with Rangers Olsen and Clarke, I learned that the suspect responsible for removing the canisters was likely using an angle grinder. Specifically, by reaching an angle grinder up the small, circular

PageID.28

porthole in the rear of the canister and grinding off the lock.



Figure 6. The BLM Hamburger Rock fee canister missing from its external case on November 7, 2024.

- 15. Based on the last time I had seen the canisters intact, I concluded that the theft had occurred between December 21, 2024, and January 4, 2025. I once again review the park's entrance booth security camera footage. The below paragraph is based on my observation of that footage.
- 16. On December 30, 2024, the VEHILCE stopped beside the park's entrance booth (Figure 7). I recognized the VEHICLE based on my observations that it was a dark-colored Chevrolet Silverado 1500 pickup truck matching the description of the VEHICLE from October 31, 2024. Screenshots of the VEHICLE showed a Utah State license plate of "T337DY." An adult, white male exited the driver's seat (Figure 8), grabbed a recreational fee envelope, returned to the

Page 9 of 18

VEHICLE, and drove off-screen. I later identified this male as ANDERTON by physical appearance, the VEHICLE registration information, and other law enforcement officers' information. Two minutes later, ANDERTON walked back in view and approached the entrance booth's recreational fee collection canister. He had pulled his jacket's hood over his head. Holding the fee envelope in his hand, ANDERTON stood beside the canister, inspecting its front and rear before slipping the envelope into the collection slot. Immediately, ANDERTON bent at the waist and reached his left hand toward the porthole in the rear of the canister (Figure 9). This porthole was the sole access to the canister's lock. His hand disappeared as he reached up into the canister's locking mechanism. Quickly, ANDERTON removed his hand and walked away from the canister. ANDERTON later drove out of the park after sunset at approximately 1828 hours.



Figure 7. ANDERTON driving the VEHICLE into the park during the time frame the canisters were pilfered.



Figure 8. ANDERTON exiting the VEHICLE.



Figure 9. ANDERTON reaching up and into the fee collection canister's locking mechanism.

17. I collected screenshots from this video and compared them to the screenshots of the suspicious truck during the first theft incident. From these comparisons, I concluded that it had been the same VEHICLE to enter the park early on October 31, 2024 (Figures 10-12).



Figure 10. Comparison of screenshots collected from entrance booth's security camera footage. Left: The VEHICLE on Oct. 31, 2024. Right: ANDERTON's VEHICLE on December 30, 2024.



Figure 11. Comparison of screenshots collected from entrance booth's security camera footage. Left: The VEHICLE on Oct. 31, 2024. Right: ANDERTON's VEHICLE on December 30, 2024.



Figure 12. Comparison of screenshots collected from entrance booth's security camera footage. Left: The VEHICLE on Oct. 31, 2024. Right: ANDERTON's VEHICLE on December 30, 2024.

18. I found a Facebook Account titled to a "Colin Anderton" with photographs depicting ANDERTON, his VEHICLE, and partner Sarah Lathrom (LATHROM). One photograph posted to this account from 2021 showed a multitude of various hand tools, including drills and grinders (Figure 13). Additionally, ANDERTON listed his occupation as "Handyman" on his most recent arrested report. Thus, I determined that ANDERTON had reasonable access to the tools necessary to remove, cut, or damage the canisters and locks.

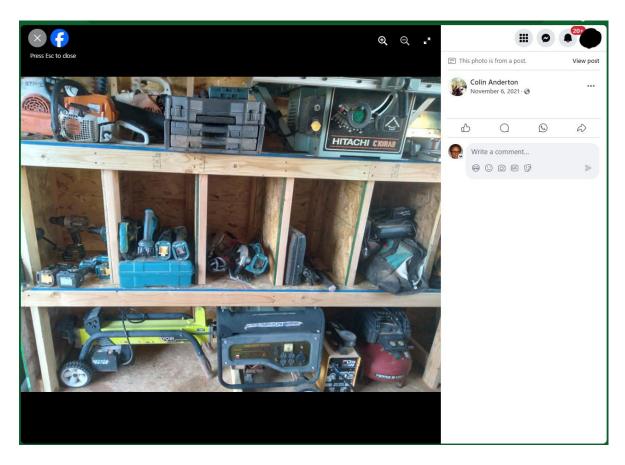


Figure 13. Screenshot of Facebook account titled to "Colin Anderton" from 2021 showing a variety of hand tools capable of cutting or removing locks.

19. On February 2, 2025, I spoke with BLM Law Enforcement Ranger Marsh about the above information and incident. He told me he had recently driven by and recorded video of a property in Moab, Utah, on which ANDERTON was suspected of residing. This property was 991 W 400 N in Moab, Utah. During the video, the distinct rims of ANDERTON's VEHICLE—the same recorded on the park's entrance booth's security cameras—was visible (Figure 14). On January 31, 2025, Ranger Marsh obtained a search warrant from U.S. Magistrate Judge Daphne A. Oberg to search a camper on the property, believed to contain items stolen from a campsite on January 17, 2025. Based on Ranger Marsh's reports, NPS and BLM are now collaborating on a joint investigation into ANDERTON for suspected thefts from fee tubes (on BLM, NPS, and private sites), thefts from camp visitors, and other thefts since late 2024.

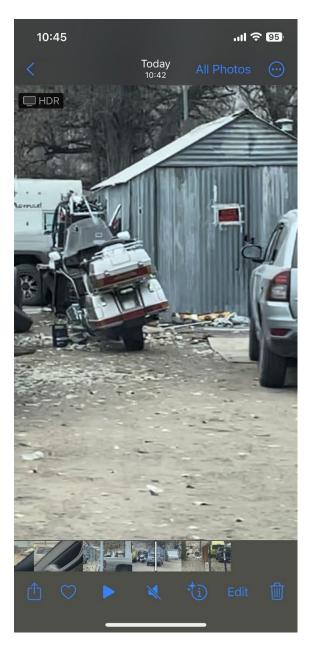


Figure 3. In the middle-left of the screenshot, the spoke-like rims of ANDERTON's VEHICLE is visible.

CONCLUSION

20. Based on all the foregoing facts, there is probable cause to believe that violations of 18 U.S.C. §§ 461 and 1361, as well as violations of 36 C.F.R. §§ 2.30 and 2.31, have been committed by ANDERTON. I submit that this affidavit supports probable cause for a warrant to search the vehicle described in Attachment A and seize the items described in Attachment B.

Based upon the provided information, I request that the Court issue the proposed 21. search warrant.

Respectfully submitted,

/s/ William Stone

William Stone United States Park Ranger National Park Service

Subscribed and sworn to before me on Feb 3, 2025

UNITED STATES MAGISTRATE JUDGE

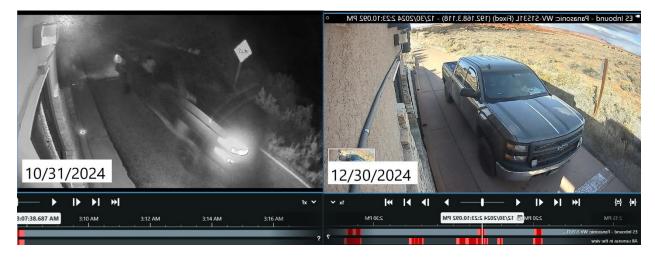
Cecilia U. Romero

ATTACHMENT A

VEHICLE to be Searched

The VEHICLE to be searched is a brown 2015 Chevrolet Silverado 1500 with VIN 3GCUKPEC9FG443808, Utah State license plate of "T337DY." The VEHICLE is registered to Colin Walker Anderton (ANDERTON) and appears to be most routinely parked at a property located at 991 W 400 N in Moab, Utah.

Figure 12 – Depicting ANDERTON's VEHICLE.



ATTACHMENT B

Property to be Seized

The following items are to be seized wherever they may be stored or found in the VEHICLE and in any form that they may be stored or found in the VEHICLE that constitute fruits, evidence, and/or instrumentalities of potential criminal offenses, including: 18 U.S.C. §§ 641 (Theft of Government Property); 1361 (Depredation of Government Property); as well as violations of 36 C.F.R., which are punishable under 18 U.S.C. § 1865, to wit: 36 C.F.R. §§ 2.30(a)(1) (Unlawful Possession of the Property of Another); 2.30(a)(5) (Acquiring Stolen Property); 2.31(a)(2) (Tampering with Property); and 2.31(a)(3) (Destroying/Damaging Property).

I. Items that are property of the government

All items that are government property which have been stolen, damaged, or otherwise removed from lands over which the National Park Service has ownership and/or jurisdiction and belong to the government, including:

- a. Browning Recon Force Edge 4K trail camera.
 - National Park Service designation: "NEED #5"
 - Serial Number: 107100731112174KE
- b. Browning BTX-SBP12 solar panel.
 - National Park Service designation: "SOLAR #1"
 - Serial Number: 221014660922SBP12
- c. Browning "Security Box" for trail camera, camouflage in color.
- d. Master Lock Python Lock, camouflage in color with a brown cord.
- e. Six Powerowl brand rechargeable nickel-metal hydride batteries.
- f. Eight rechargeable nickel-metal hydride batteries neon-green in color.
- g. SanDisk brand SD card.
- h. Padlocks which open by key.
- i. Metal, cuboid-shaped donation-collection canister approximately eight inches by five inches by four inches in size.
- j. Envelopes orange in color, bearing National Park Service designation, and used for the collection of fee or donation monies or credit/debit card information.

II. Items that are property designed for use, intended for use, or used in committing a crime

All items that are property designed for use, intended for use, or used in committing the above crime(s) which removed the above items from lands over which the National Park Service has ownership and/or jurisdiction, including:

- a. Coat hanger
- b. Electric or manual hand tool capable of prying, damaging, opening, or destroying
- c. padlocks, cable-locks, and metal cuboid-shaped canisters, such as:
- d. Bolt cutter
- e. Drill, hand-held
- f. Grinder, hand-held (e.g., angle, flexible, portable, etc.).
- g. Hacksaw

- h. Nail punchi. Pipe cutterj. Prybar/crowbark. Lockpicking kit or accessories